

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PRESIDENT DONALD J. TRUMP, 45th President
of the United States of America, in his individual
capacity,

Plaintiff,

v.

3:23-cv-06883- PGG

SIMON & SCHUSTER, INC., a New York
corporation, ROBERT WOODWARD p.k.a. BOB
WOODWARD, an individual, and PARAMOUNT
GLOBAL, a Delaware corporation, f/k/a Viacom
Inc., successor by merger to CBS Corporation, a
Pennsylvania corporation f/k/a Westinghouse
Electric Corporation,

Defendants.

**DECLARATION OF ELIZABETH A. MCNAMARA IN SUPPORT OF DEFENDANTS’
MOTION TO DISMISS PLAINTIFF DONALD TRUMP’S SECOND AMENDED
COMPLAINT**

I, Elizabeth A. McNamara, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

I am a partner at the law firm of Davis Wright Tremaine LLP, attorneys for Defendants Simon & Schuster, Inc., Robert Woodward and Paramount Global (collectively, “Defendants”), and I submit this declaration support of Defendants’ motion to dismiss the Second Amended Complaint in the above-captioned action. This declaration is based on my personal knowledge, except as otherwise indicated.

1. Annexed hereto as **Exhibit A** is a true and correct copy of the paperback edition of *The Trump Tapes* by Bob Woodward.¹

¹ Pursuant to the Order dated April 5, 2023 (Dkt. 30), Defendants have previously submitted Exhibit A to the Court in compact disk and hard copy formats.

2. Annexed hereto as **Exhibit B** is a true and correct copy of the audiobook edition of *The Trump Tapes* by Bob Woodward.²

3. Annexed hereto as **Exhibit C** is a true and correct copy of the brief that Plaintiff President Donald J. Trump (“President Trump”) filed in *Carroll v. Trump*, 20-3977 (2d Cir.) on January 15, 2021.

4. Annexed hereto as **Exhibit D** is a true and correct copy of the brief that President Trump filed in *Trump v. Carroll*, 22-SP-745 (D.C.) on November 9, 2022.

Dated: November 22, 2023

/s/Elizabeth A. McNamara

Elizabeth A. McNamara

² Pursuant to the Order dated April 5, 2023 (Dkt. 30), Defendants have previously submitted Exhibit B to the Court in compact disk format.